

## **REMARKS**

**[0005]** Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1-59 are currently pending
- No claims are canceled herein
- No claims are withdrawn herein
- Claims 20-38 and 59 are amended herein
- No new claims are added herein

**[0006]** Claims 20-38 are amended to replace “computer-readable medium” with “computer storage medium”. Support for the amendments to claims 20-38 is found in the specification at least at Page 9, lines 1-18. Claim 59 is amended to correct a typographical error.

## **Allowed Claims**

**[0007]** Claims 14-18, 33-37, and 50-52 are objected to as depending from a rejected base claim. The Examiner indicates, however, that these claims would be allowable if rewritten in independent form including all of the features of the base claims from which they depend. Applicant thanks the Examiner for this indication. Arguments for the allowability of the independent claims from which these claims depend are presented herein. Accordingly, Applicant submits that these claims, as currently presented, are

also allowable, and respectfully requests that the objection to these claims be withdrawn.

### **Cited Document**

**[0008] Bommareddy:** Bommareddy et al., U.S. Patent No. 6,880,089 has been applied to reject one or more claims of the Application.

### **Bommareddy Fails to Anticipate Claims 1-13, 19-32, 38-49, and 53-59**

**[0009]** Claims 1-13, 19-32, 38-49, and 53-59 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Bommareddy. Applicant respectfully traverses the rejection.

### **Independent Claims 1, 20, 39, 54, and 59**

**[0010]** Applicant submits that the Office has not shown that Bommareddy anticipates these claims. Specifically, Bommareddy does not disclose the following features of claim 1 (with emphasis added):

A method for conducting physical address discovery, facilitating point-to-point communications between hosts of a cluster operating in a cluster mode wherein acceptable messages are addressed to a shared cluster address, the method comprising:

receiving **by a target host**, an address discovery request **initiated by a source host** seeking a physical address of the target host, **wherein the source host and the target host are both hosts within the same cluster**; and

generating by the target host, an address discovery response acceptable by the source host operating in the cluster mode, wherein the address discovery response comprises:

a response source physical address field specifying a non-cluster mode physical address of the target host.

**[0011]** Claim 1 recites in part, “receiving by a target host, an address discovery request initiated by a source host..., wherein the source host and the target host are both hosts within the same cluster.” Similarly:

- claim 20 recites, “receiving by a target host within the cluster, an address discovery request, initiated by a source host within the cluster, seeking a physical address of the target host; and generating by the target host, an address discovery response acceptable by the source host operating in the cluster mode”
- claim 39 recites, “a host computer system comprising: a network interface for receiving an address discovery request initiated by a source host within the cluster...; generating an address discovery response acceptable by the source host operating in the cluster mode..., wherein the host computer system is one of the hosts of the cluster operating in the cluster mode”
- claim 54 recites, “a method for processing point-to-point communications between hosts of a cluster...implemented by a network communication protocol-specific layer of each host, ...receiving an intraccluster message issued by an initiating host of the cluster, the intraccluster message including within a message destination field, a non-cluster mode physical address of a target host of the cluster, the target host replacing, within the intraccluster message, the non-cluster mode physical address with the shared cluster address...”

- claim 59 recites, “receiving by a target host within the cluster, an address discovery request seeking a physical address of the target host; determining by the target host, that the address discovery request was issued by a source host within the cluster...; generating by the target host, an address discovery response...”

**[0012]** Regarding each of these elements, the Office cites Bommareddy, col. 22, line 46 – col. 23, line 7 and col. 4, lines 18-38, stating with reference to claim 1, that, “both the source server and the destination device are on the same subnet,” and, “the internal network flow controller receives an ARP request for an internal address of a node.” (Office Action, page 2-3.) However, Bommareddy does not describe the “internal network flow controller” as being either the “source server” or the “destination device”.

**[0013]** Bommareddy, col. 22, line 46 – col. 23, line 7 states:

Network flow controller 810 uses Proxy ARP to ensure that packets destined for any of the cluster IP addresses are sent to network flow controller 810 rather than directly to the servers within the clusters. When a router attempts to send a packet to a cluster but is not informed of the destination MAC address, the router sends an ARP Request packet requesting a station with the IP address indicated in the ARP Request packet to reply with station MAC address. The network flow controller 810 responds to an ARP Request packet with a cluster IP address received on a Router Port by sending the MAC address of the network flow controller 810. The router then uses the network flow controller 810 MAC address when sending packets for the cluster IP address. The network flow controller 810 receives all traffic from Router Ports directed at clusters.

When a server attempts to send a packet to a particular destination on the same subnet but does not have the appropriate destination MAC address, the server sends out an ARP Request packet. The network flow

controller 810, on receiving an ARP Request from a server, intercepts the ARP Request. The network flow controller 810 modifies the ARP Request source information, including MAC and IP addresses, such that the information appears to have been sent by network flow controller 810 rather than by one of the servers. The modified ARP Request is then broadcast. Upon receiving a reply, network flow controller 810 modifies the ARP Reply destination information, including MAC and IP addresses. A copy of the ARP Reply is sent back directly to each server within the cluster.

**[0014]** As stated in the first sentence of the portion of Bommareddy reproduced above, “Network flow controller 810 uses Proxy ARP to ensure that packets destined for any of the cluster IP addresses are sent to network flow controller 810 rather than directly to the servers within the clusters.” This statement provides evidence that the network flow controller is not itself a server within the clusters. Further evidence of the same is found in the following citations from Bommareddy:

Flow controllers are connected to the firewalls...the flow controllers supply high availability, scalability, and traffic distribution for the firewalls in the firewall cluster. (Abstract.)

Flow controllers...are placed on both sides of the firewalls...Additional firewalls may be added to the firewall clustering system...network flow controller 136 manages the DMZ firewall cluster 132. (Col. 6, lines 53-67.)

**[0015]** Furthermore, each of Figures 1, 4, and 8 illustrate the flow controller as a component that is able to communicate with, but is separate from the firewall clusters. Consequently, as discussed during the above-referenced Examiner interview, Bommareddy does not disclose all of the elements and features of these claims.

Accordingly, Applicant submits that Bommareddy does not anticipate these claims, and respectfully requests that the rejection of these claims be withdrawn.

*Dependent Claims 2-13, 19, 21-32, 38, 40-49, 53, and 55-58*

**[0016]** Claims 2-13, 19, 21-32, 38, 40-49, 53, and 55-58 each ultimately depend from one of independent claims 1, 20, 39, 54, and 59. As discussed above, claims 1, 20, 39, 54, and 59 are not anticipated by Bommareddy, and are therefore allowable over Bommareddy. Therefore, claims 2-13, 19, 21-32, 38, 40-49, 53, and 55-58 are also allowable over Bommareddy for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

**Conclusion**

**[0017]** Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

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